

LABATON SUCHAROW LLP

Thomas A. Dubbs (*pro hac vice* forthcoming)
Carol C. Villegas (*pro hac vice*)
Michael P. Canty (*pro hac vice* pending)
Thomas G. Hoffman, Jr. (*pro hac vice*)
140 Broadway
New York, New York 10005

Lead Counsel to Securities Lead Plaintiff and the Class

MICHELSON LAW GROUP

Randy Michelson (SBN 114095)
220 Montgomery Street, Suite 2100
San Francisco, California 94104

Local Bankruptcy Counsel to Securities Lead Plaintiff and the Class

LOWENSTEIN SANDLER LLP

Michael S. Etkin (*pro hac vice*)
Andrew Behlmann (*pro hac vice*)
Scott Cargill
Colleen Restel
One Lowenstein Drive
Roseland, New Jersey 07068

Special Bankruptcy Counsel to Securities Lead Plaintiff and the Class

(additional counsel on Exhibit A)

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)
Chapter 11
(Jointly Administered)

**NOTICE OF PERA'S MOTION FOR
APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF SELECTION OF
LEAD COUNSEL**

Date: January 9, 2024
Time: 10:00 a.m. (PT)
Before: **(Telephonic or Video Only)**
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, California 94102

Objection Deadline: December 26, 2023 at
4:00 PM (PT)

NOTICE OF PERA'S MOTION FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF SELECTION OF LEAD

PLEASE TAKE NOTICE that on January 29, 2019, PG&E Corporation and Pacific Gas and Electric Company (collectively, the “**Debtors**” or “**Reorganized Debtors**”) filed voluntary cases for relief under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”). On June 20, 2020, the Bankruptcy Court confirmed the Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 [Dkt. No. 8048] (as may be modified, supplemented, or amended from time to time, and together with all schedules and exhibits thereto, the “**Plan**”). The Plan became effective on July 1, 2020.

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court will hold a hearing on **January 9, 2024, at 10:00 a.m.** (Pacific Time) (the “**Hearing**”) before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the Procedures for Noticing and Conducting Hearings in the San Francisco Division of the United States Bankruptcy Court for the Northern District of California (effective September 1, 2023), the Hearing shall be conducted by video or teleconference, and the Courtroom will be closed. The Bankruptcy Court’s website provides information regarding how to arrange an appearance at a video or telephonic hearing. If you have questions about how to participate in a video or telephonic hearing, you may contact the court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court’s website at www.canb.uscourts.gov.

PLEASE TAKE FURTHER NOTICE that, in addition to any other matters scheduled for the Hearing, the Bankruptcy Court is scheduled to hear PERA’s *Motion For Appointment As Lead Plaintiff And Approval Of Selection Of Lead Counsel* [Dkt. No. 14169] (the “**Motion**”).

PLEASE TAKE FURTHER NOTICE that any oppositions or responses to the Motion must be in writing, filed with the Bankruptcy Court, and served on the counsel for Lead Plaintiff at the above-referenced addresses so as to be received by no later than 4:00 p.m. (Pacific Time) on **December 26, 2023**. Any oppositions or responses must be filed and served on all “Standard Parties” as defined in, and in accordance with, the *Second Amended Order Implementing Certain*

1 *Notice and Case Management Procedures* entered on May 14, 2019 [Dkt. No. 1996] (the “**Case**
2 **Management Order**”). Any relief requested in the Motion may be granted without a hearing if
3 no opposition is timely filed and served in accordance with the Case Management Order. In
4 deciding the Motion, the Court may consider any other document filed in these Chapter 11 Cases
5 and related Adversary Proceedings.

6 **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its supporting
7 papers can be viewed and/or obtained: (i) by accessing the Court’s website at
8 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450
9 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Reorganized Debtors’ notice
10 and claims agent, Kroll Restructuring Administration LLC (formerly known as Prime Clerk), at
11 <https://restructuring.ra.kroll.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based
12 parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@ra.kroll.com.
13 Note that a PACER password is needed to access documents on the Bankruptcy Court’s website.

14
15 Dated: December 8, 2023

Respectfully submitted,

16 **LABATON SUCHAROW LLP**

17 By: /s/ Thomas A. Dubbs
18 Thomas A. Dubbs (*pro hac vice*)
19 Lead Counsel to Securities Lead
20 Plaintiff and the Class

- and -

21 **MICHELSON LAW GROUP**

22 Local Bankruptcy Counsel to Securities Lead
23 Plaintiff and the Class

- and -

24 **LOWENSTEIN SANDLER LLP**

25 Special Bankruptcy Counsel to Securities Lead
26 Plaintiff and the Class

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- and -

**WAGSTAFFE, VON LOEWENFELDT,
BUSCH
& RADWICK, LLP**

Liaison Counsel for the Class

- and -

ROBBINS GELLER RUDMAN & DOWD LLP

Counsel for the Securities Act Plaintiffs

- and -

**VANOVERBEKE, MICHAUD & TIMMONY,
P.C.**

Additional Counsel for the Securities Act Plaintiffs

EXHIBIT A
COUNSEL

LABATON SUCHAROW LLP

Thomas A. Dubbs
Carol C. Villegas
Jeffrey A. Dubbin (SBN 287199)
Aram Boghosian
140 Broadway
New York, New York 10005
Telephone 212-907-0700
tdubbs@labaton.com
cvillegas@labaton.com
jdubbin@labaton.com
aboghosian@labaton.com

Lead Counsel to Securities Lead Plaintiff and the Class

MICHELSON LAW GROUP

Randy Michelson, Esq. (SBN 114095)
220 Montgomery Street, Suite 2100
San Francisco, CA 94104
Telephone 415-512-8600
Facsimile 415-512-8601
randy.michelson@michelsonlawgroup.com

Local Bankruptcy Counsel to Securities Lead Plaintiff and the Class

LOWENSTEIN SANDLER LLP

Michael S. Etkin (*Pro Hac Vice*)
Andrew Behlmann
Scott Cargill
Colleen Restel
One Lowenstein Drive
Roseland, New Jersey 07068
Telephone 973-597-2500
Facsimile 973-597-2333
metkin@lowenstein.com
abehlmann@lowenstein.com

Special Bankruptcy Counsel to Securities Lead Plaintiff and the Class

ROBBINS GELLER RUDMAN & DOWD LLP

Darren J. Robbins (SBN 168593)
Brian E. Cochran (SBN 286202)
655 West Broadway, Suite 1900
San Diego, California 92101
Telephone 619-231-1058
darrenr@rgrdlaw.com
bcochran@rgrdlaw.com

VANOVERBEKE, MICHAUD & TIMMONY, P.C.

Thomas C. Michaud
79 Alfred Street
Detroit, Michigan 48201
Telephone 313-578-1200
tmichaud@vmtlaw.com

Additional Counsel for the Securities Act Plaintiffs

WAGSTAFFE, VON LOEWENFELDT, BUSCH & RADWICK, LLP

James M. Wagstaffe (SBN 95535)
Frank Busch (SBN 258288)
100 Pine Street, Suite 725
San Francisco, California 94111
Telephone 415-357-8900
wagstaffe@wvbrlaw.com
busch@wvbrlaw.com

Liaison Counsel for the Class

ROBBINS GELLER RUDMAN & DOWD LLP

Willow E. Radcliffe (SBN 200089)
Kenneth J. Black (SBN 291871)
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, California 94104
Telephone 415-288-4545
willowr@rgrdlaw.com
kennyb@rgrdlaw.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28